



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

November 8, 2002

Certified Mail No. 7099 3220 0006 2681 6067

Wade Wolcott, President
Dynamic Fabricators LLC
22515 W. Highway 53
Rathdrum, ID 83858

RE: AIRS Facility No. 055-00035, Dynamic Fabricators LLC, Rathdrum
Tier I Operating Permit Administrative Amendment

Dear Mr. Wolcott:

The Department of Environmental Quality (Department) is issuing administratively amended, Tier I Operating Permit No. 055-00035 to Dynamic Fabricators LLC in accordance with Title V of the Clean Air Act and IDAPA 58.01.01.381.01.b. This action effectively changes the name of the permitted facility from GEA/Thermal-Dynamic Towers Inc. to Dynamic Fabricators LLC for the purposes of Title V and IDAPA 58.01.01, *et seq.*

The enclosed permit is effective immediately and is based on the information contained in your permit application, received August 7, 2002.

Tom Harman of the Coeur d'Alene Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, the Department encourages you to call Bill Rogers at (208) 373-0502 to discuss any questions or concerns you may have with the enclosed permit.

Sincerely,



Katherine B. Kelly
Administrator
Air Quality Division

Enclosures

KK/tk Project No. T1-010922 G:\Air Quality\Stationary Source\SS Ltd\T1\Dynamic Fabricators\Dynamic Amendment Final PL.doc

cc: Joan Lechtenberg, Air Quality Division
Tom Harman, Coeur d'Alene Regional Office
Laurie Kral, EPA Region 10

TI- 010922



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: 055-00035

AQCR: 062

CLASS: A

SIC: 3079

ZONE: 11

UTM COORDINATE (km): 502.1, 5290.5

1. PERMITTEE
Dynamic Fabricators, LLC

2. PROJECT
Tier I Operating Permit

3. MAILING ADDRESS
22515 W. Highway 53

CITY
Rathdrum

STATE
ID

ZIP
83858

4. FACILITY CONTACT
Wade Wolcott

TITLE
President

TELEPHONE
(208) 773-1787

5. RESPONSIBLE OFFICIAL
Wade Wolcott

TITLE
President

TELEPHONE
(208) 773-1787

6. EXACT PLANT LOCATION
N 1/4 of SW 1/4 of NW 1/4 of Section 16, Township 51N, Range 5W

COUNTY
Kootenai

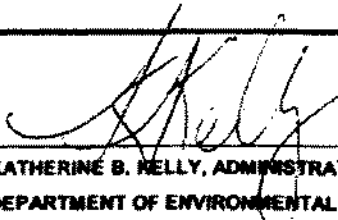
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Fiberglass fabrication

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 29, 2000

DATE EXPIRES: December 29, 2004

*Date never changed when
reissued on 11/8/02*

should be

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	Potential to Emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT No. 055-00035

Permittee: Dynamic Fabricators, LLC
Location: Rathdrum, Idaho

Date Issued: December 29, 2000
Date Expires: December 29, 2004

1. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 1.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
1.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.651	1.2, 1.3, 1.4, 1.11
1.5	Odor	Reasonable control	IDAPA 58.01.01.775-776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.11
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.11
1.13	Renovation and demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.14	Regulated substances for accidental release prevention	Compliance with 40 CFR 68	40 CFR 68	1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.11, 1.16
1.16	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.11, 1.15
1.17	PM	0.015 gr/dscf at 3% O ₂ for gas; 0.050 gr/dscf at 3% O ₂ for liquid	IDAPA 58.01.01.677	1.11
1.18	Recycling and emissions reduction	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	1.11

Fugitive Emissions

- 1.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 5/1/94]
- 1.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 1.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

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- 1.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.08, 4/5/00]

Odors

- 1.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 1.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date corrective action was taken.

[IDAPA 58.01.01.775-776, 5/1/94]

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this permit condition.
- 1.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the corrective action does not eliminate the visible emissions, then a Method 9 visible emissions observation must be conducted. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

[IDAPA 58.01.01.625, 5/1/94]

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The permittee shall maintain records of the results of each quarterly visible emission inspection. The records shall include, at a minimum, the date and results of each inspection and test, if required, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.08, 4/5/00]

Excess Emissions

1.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.

1.9.1 The person responsible for, or in charge of, a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event, to reduce the frequency of occurrence of such events, to minimize the amount by which the emission standard is exceeded, and shall, as provided below or upon request of the Department submit a full report of such occurrence including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

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- 1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
[IDAPA 58.01.01.134.02.a, 4/5/00]
- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.
[IDAPA 58.01.01.134.02.b, 4/5/00]
- The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
[IDAPA 58.01.01.134.02.c, 3/20/97]

- 1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

- 1.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 02, 3/20/97]

- 1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.03, 4/5/00]

- 1.9.5.1 An excess emissions records book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- 1.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in

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accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00
(state-only; federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]

Reports and Certifications

- 1.10 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Pkwy.
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

Monitoring and Recordkeeping

- 1.11 The permittee shall maintain sufficient record keeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

- 1.12 The facility shall comply with the requirements of *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

IDAPA 58.01.01.600-616, 5/1/94]

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Renovation and Demolition

- 1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

Test Methods

- 1.15 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions:

Table 1.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, use IDAPA 58.01.01.625 and Method 9; otherwise, use IDAPA 58.01.01.625 only.

* or Department-approved alternative in accordance with IDAPA 58.01.01.157

Compliance Testing

- 1.16 If testing is required, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests such testing not be performed on weekends or state holidays.

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All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval from the Department for any testing deviations, the Department may determine that the test does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit a compliance test report to the Department for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Pkwy.
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Fuel-Burning Equipment

- 1.17 If testing is required, the permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

Recycling and Emissions Reduction

- 1.18 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

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2. EMISSIONS UNIT/SOURCE NAME: MANUFACTURING FIBERGLASS REINFORCED PLASTIC (FRP) PRODUCTS

Summary Description

Table 2.1 contains only a summary of the requirements that apply to the FRP Products process. Specific permit requirements are listed below Table 2.1.

Table 2.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	PM and PM ₁₀	2.19 lb/hr; 5.68 T/yr	PTC No. 055-00035	2.2, 2.3, 2.4, 2.5, 2.6, 2.8
2.7	PM	Process weight	IDAPA 58.01.01.701	2.2, 2.3, 2.4, 2.5, 2.6, 2.8
2.9	VOC	1.69 T/yr (excluding styrene)	PTC No. 055-00035	2.10
2.11	Acetone	600 lb/month	PTC No. 055-00035 (state-only)	2.12
2.13	Styrene	18.1 lb/hr	PTC No. 055-00035 (state-only)	1.11
2.14	Styrene	54.4 T/yr	PTC No. 055-00035	2.10, 2.15, 2.16, 2.17, 2.18, 2.19, 2.20, 2.21, 2.22

Permit Limits / Standard Summary

- 2.1 The PM and PM₁₀ emissions from Stack No. 1 and Stack No. 2 combined shall not exceed 2.19 lb/hr, as determined by the Department's emission estimation methods used in the permit analysis. Annual PM and PM₁₀ shall not exceed 5.68 T/yr, as determined by multiplying the allowable pound-per-hour emission rate by the actual hours per year that the process(es), which vent to these stacks, operate(s).
[PTC No. 055-00035, 8/25/94]
- 2.2 Performance tests shall be conducted for PM emissions if the visible emissions exceed 20% opacity for more than three minutes in any 60-minute period from either of Stack No. 1 or Stack No. 2. The tests shall be conducted in accordance with IDAPA 58.01.01.157, including testing while the operation is performed at maximum capacity. During the performance test, the following data shall be recorded: amount of resins, gelcoat, catalyst, and fiberglass used, and the type of resins and gelcoat used.
[PTC No. 055-00035, 8/25/94]
- 2.3 Within 60 days of issuance of this permit, the permittee shall have developed an Operations and Maintenance (O&M) manual for the filters used to control particulate emissions, which describes the procedures that will be followed to comply with Permit Condition 2.1. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.
[IDAPA 58.01.01.322.06, 5/1/94]

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- 2.4 The permittee shall at all times keep all exterior doors and/or windows of the building, used for fiber glassing operations, tightly closed except for the explicit purpose of moving necessary equipment, materials, or personnel into or out of the building.
[PTC No. 055-00035, 8/25/94]
- 2.5 Maximum usage of fiberglass shall not exceed 400,000 pounds per any consecutive 12 months.
[PTC No. 055-00035, 8/25/94]

Monitoring and Recordkeeping Requirements

- 2.6 The permittee shall monitor and record the total pounds of fiberglass used each month. This information shall be maintained in records and shall be kept onsite for a period of five years.
[IDAPA 58.01.01.322.01, 3/19/99]
- 2.7 The permittee shall not emit to the atmosphere from any process or process equipment, commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equation, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:
- a. If PW is less than 9,250 lb/hr,
$$E = 0.045(PW)^{0.60}$$
- b. If PW is equal to or greater than 9,250 lb/hr
$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]
- 2.8 At least once during the permit term, the permittee shall perform performance tests to measure PM and PM₁₀, emissions from Stack No.1 and Stack No. 2 exhaust stacks to demonstrate compliance with Permit Conditions 2.1 and 2.7. The tests shall be performed while operating at the maximum achievable full load conditions.
[IDAPA 58.01.01.322.06, 5/1/94]
- 2.9 The VOC emissions (other than styrene) from Stack No. 1 and Stack No. 2 combined shall not exceed 1.69 T/yr.
[PTC No. 055-00035, 8/25/94; IDAPA 58.01.01.322.01, 3/19/99]
- 2.10 The permittee shall on a monthly basis monitor and record the amount of non-styrene VOC's which were emitted. It shall be assumed that all VOC's are emitted. Each month the permittee shall total the number of tons emitted during the previous 12-month period. The permittee shall on a monthly basis record the amount of any VOC containing material that was used. The recorded information shall include the percent of VOC in the material and the percent of styrene, if present.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.11 The permittee shall not use more than 600 pounds of acetone per month.
[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

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- 2.12 The permittee shall monitor and record the amount of acetone used each month in pounds.
[IDAPA 58.01.01.322.06 (state-only), 5/1/94]
- 2.13 The combined styrene emission from Stack No. 1 and Stack No. 2 shall not exceed 18.1 lb/hour, as determined by the Department's emission estimation methods used in the permit analysis.
[PTC No. 055-00035 (state-only), 8/25/94]
- 2.14 The combined annual styrene emissions from Stack No. 1 and Stack No. 2 shall not exceed 54.4 T/yr, as determined by multiplying the allowable pound-per-hour emission rate by the actual hours per year that the process(es), which vent to these stacks, operate(s).
[PTC No. 055-00035 (state-only), 8/25/94]
- 2.15 The permittee shall use polyester resins with a monomer content of no more than 35% by weight. This provision shall not apply to the use of gelcoat, resin used for mold construction, and corrosion-resistant resin.
[PTC No. 055-00035, 8/25/94]
- 2.16 Excluding the gelcoat and specialty resins, 90% by weight of all polyester resins used by the permittee shall have a styrene monomer content of no more than 35% by weight.
[PTC No. 055-00035, 8/25/94]
- 2.17 The permittee shall use a gelcoat with a styrene monomer content of no more than 43% by weight.
[PTC No. 055-00035, 8/25/94]
- 2.18 Airless spray guns shall be used for all spray-up processes, including gelcoat application.
[PTC No. 055-00035, 8/25/94]
- 2.19 The permittee shall use closed containers for the disposal of all gelcoat, resin, catalyst, and cleaning materials in such a manner, as to effectively control styrene and VOC emissions to the surrounding air.
[PTC No. 055-00035, 8/25/94]
- 2.20 The permittee shall at no time allow containers of gelcoat, resin, catalyst, or cleaning materials to be open to the atmosphere, other than to transfer material to or from the container, or to insert a pump. This shall apply to full, partially full, and empty containers.
[PTC NO. 055-00035, 8/25/94]
- 2.21 Resins, gelcoat, and catalyst are restricted to a maximum usage as follows in any consecutive 12-month period:
- Resins 720,000 lb/yr
 - Gelcoat 103,000 lb/yr
 - Catalyst 17,000 lb/yr
- [PTC No. 055-00035, 8/25/94]
- 2.22 The permittee shall on a monthly basis monitor and record the pounds of resins, gelcoat and catalyst that was used. The permittee shall also aggregate the total pounds used of each during any consecutive 12-month period. For each resin, gelcoat, and catalyst used, the permittee shall record the styrene content as percent by weight.
[IDAPA 58.01.01.322.06. 5/1/94]

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- 2.23 Neither Stack No. 1 nor Stack No. 2 shall be equipped with a rain cap or any other obstruction that would result in the downward deflection of the exhaust gas stream.
[PTC No. 055-00035, 8/25/94]

- 2.24 For any testing, when required, the permittee shall use the test methods to measure the pollutant emissions for the applicable requirements referenced in the following table.

Table 2.2 TEST METHODS TO MEASURE POLLUTANT EMISSIONS

Permit Condition	Test Method	Special Conditions
2.1	EPA Method 5	Test required if opacity greater than 20%.
2.8	EPA Method 5	Test required once during permit term.
2.13, 2.14	Department-approved method (must be approved in writing)	

[IDAPA 58.01.01.322.01, 3/19/99; PTC No. 055-00035, 8/25/94]

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3. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 4.1 INSIGNIFICANT ACTIVITIES

Location of the Emission(s) Unit at the Facility	Description	Insignificant Activities IDAPA Citation Section
Associated with FRP production.	6,000-gallon resin tank.	IDAPA 58.01.01.317.01.b.3
Building makeup air heater fuel source.	1 propane tank, 300-gal capacity.	IDAPA 58.01.01.317.01.b.4

- 3.1 There are no additional monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

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4. EMISSION LIMITS: STACK NO. 1 AND STACK NO. 2

Table 4.1 POINT SOURCE HOURLY (lb/hr) AND ANNUAL (T/yr) EMISSION LIMITS

Source Description	PM /PM ₁₀ ^a		VOC	Styrene	
	lb/hr	T/yr	T/yr	lb/hr	T/yr
Stack No. 1 & No. 2	2.19	5.68	1.69	18.1 (state-only)	54.4 (state-only)

^a particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.

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5. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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8. Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15); 40 CFR 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Clean Air Act Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/19/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "State-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) By the Department in accordance with state law; and (ii) By the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:
 - 14.1 Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit.
 - 14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit.
 - 14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - 14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.
[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.
[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 18.1 The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.
[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

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- 18.2 If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- 19.2 The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- 19.3 Nothing in this permit shall alter or affect the following:
- 19.3.1 Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- 19.3.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 19.3.3 The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- 19.3.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94;
IDAPA 58.01.01.382.04; 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20.1 For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.

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- 20.2 For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- 20.3 For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- 20.4 For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94;
40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- 21.1 Compliance certifications for all emissions units shall be submitted annually beginning 12-months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department.
- 21.2 The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices.
- 21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- 21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification.
- 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information.
- 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph 21.c.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined fewer than 40 CFR Part 64 occurred.

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21.3.4 Such other facts as the Department may require to determine the compliance status of the source.

21.4 All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900 and 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

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Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]